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October 11, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: 2001-Third Quarter Status Report - E911 TTY Implementation,
Triton PCS, Inc. and Triton PCS License Company, L.L.C.,
CC Docket No. 94-102

Dear Ms. Salas:

Pursuant to the Federal Communications Commission's Fourth Report and Order in CC Docket 94-102 ("Fourth R&O"), this letter provides a status report on the efforts by Triton PCS, Inc. and its licensee subsidiary Triton PCS License Company, L.L.C. (collectively "Triton") to implement E911 TTY compatibility on Triton's commercial wireless services networks. In the Fourth R&O, the Commission requested that carriers provide reports by the fifteenth of the month following the end of each calendar quarter detailing certain development, testing, and deployment activities. This letter is Triton's third E911 TTY report and it covers activity during the third quarter of 2001.

Triton holds PCS licenses for markets in portions of North Carolina, South Carolina, Virginia, Kentucky, West Virginia, Georgia, and Tennessee. Across all these markets, Triton's network utilizes LM Ericsson Telephone Co. ("Ericsson") TDMA infrastructure equipment. As a result, Triton is directly dependent upon Ericsson's development of TTY solutions that can be integrated into Triton's existing network.

During this quarter, Ericsson provided Triton with updated information regarding the status of its TTY/TDMA product development. Ericsson reported to Triton that the first order applications (FOA) trial previously scheduled for August is now scheduled for the end of October 2001 with a major TDMA carrier. Ericsson has also released to Triton a customer feature description (CFD) for the Text Telephone (TTY) feature that contains specifics on network prerequisites and implementation instructions. As indicated in Triton's first quarterly report, and verified in the CFD, Triton must first implement Generic Version 7 software in its switches to be able to install the TTY feature. This implementation is currently underway in Triton's seven switches with

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completion scheduled by the end of 2001. When Ericsson completes its FOA and offers the TTY feature commercially, Triton will implement the feature into its network. With respect to handset availability, Triton does not manufacture handsets, and accordingly, must rely upon the efforts of the various handset manufacturers that develop and sell TTY compatible TDMA handsets. Additionally, until such time as Ericsson's switching software upgrades are available, Triton has no ability to test any manufacturer's handsets to evaluate their compatibility with TTY software and network operations.

In establishing its quarterly reporting requirement, the Commission requested that reporting carriers provide specific information on the following "milestones" and issues:

Development Activities

1. **Network Infrastructure Software Development.** As outlined above, Ericsson is Triton's infrastructure vendor across Triton's entire network and Triton remains in constant contact with Ericsson on TTY development issues. Ericsson has reported to Triton the following:
 - First Order Application (FOA) testing of Ericsson infrastructure software with a major TDMA carrier is being negotiated for a revised date at the end of October, 2001.
 - General Availability of software has not been indicated by Ericsson at this time, but is anticipated to follow closely upon the completion of the FOA.
2. **Handset Development and Testing Plans.** Handset development and testing is the responsibility of Triton's handset vendors/manufacturers. As indicated above, Triton does not manufacture any handsets itself and must rely on the handset vendor's TTY development efforts. However, Triton has solicited and received status reports from three of its current handset vendors indicating that TDMA handsets with TTY compatibility are anticipated to be available to carriers for testing later this year.
3. **Beta Testing and Lab Testing.** This testing will be completed by the handset vendors rather than carriers such as Triton.
4. **Release and General Availability to Carriers of Network Infrastructure Software.** Triton will make use of Ericsson's network infrastructure software as soon as it is available commercially according to Ericsson's release schedule.
5. **Availability to Carriers of Full Acceptance Test Units.** After compatible handsets are made available by Triton's handset manufacturers, (and after the necessary Ericsson switch software upgrades are implemented) Triton will obtain test handset units for acceptance testing.

6. Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY Devices. These efforts are directly dependent on the efforts of Triton's infrastructure vendor, Ericsson and upon Triton's handset vendors. After the necessary switch software upgrades are implemented and compatible handsets are available, Triton will take all steps within its control to comply with utilization of enhanced TTY devices that are compatible with the Ericsson TDMA platform that makes up its current network.

Testing and Deployment Activities

7. Carrier coordination of testing with PSAP. Triton intends to utilize its existing relationships with PSAPs to facilitate testing of TTY compatibility with E911 communications after the necessary switch software upgrades and compatible handsets are available.

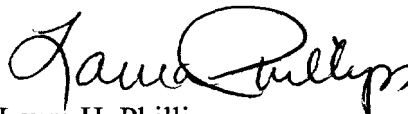
8. Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, And Other Necessary Tests. Until such a time as the necessary switch software upgrades are implemented and compatible handsets are available, Triton can only develop a thorough test plan to ensure full compliance with TTY compatibility requirements. Once software upgrades have been completed and handsets are made available, Triton will conduct tests to ensure achievement of TTY compatibility requirements.

9. Retail Availability Of Necessary Consumer Equipment. When TTY compatible consumer equipment becomes available, Triton will utilize its established chain of retail outlets, its Internet website and all other marketing sources to make TTY compatible equipment available to interested subscribers.

10. Geographic Scope Of Network Infrastructure Deployment. Triton intends to deploy TTY support capability and compatibility in its entire network once the necessary switch software is available from Ericsson, TTY enabled handsets are available from handset vendors, and adequate testing has taken place to ensure that the requirements of TTY compatibility are met. Triton cannot provide a date certain as to when each of these implementation milestones will be achieved, however, it will continue to monitor the events that must occur prior to Triton's ability to test TTY performance on its network and will continue to report progress as required by the Commission.

Should any questions arise or if there is need for further information concerning this Triton status report or Triton's TTY implementation, please contact the undersigned at (202)-776-2824.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Laura Phillips", with a large, stylized loop at the end.

Laura H. Phillips
Counsel for Triton PCS, Inc.

cc: Glen Robinson – Senior Vice President, Engineering and IT
Patrick Forster, Wireless Telecommunications Bureau
Mindy Littell, Wireless Telecommunications Bureau